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Presentment Date and Time: July 13, 2010 at 12:00 noon (Prevailing Eastern Time)
Objection Deadline: July 13, 2010 at 11:30 a.m. (Prevailing Eastern Time)

JONES DAY 222 East 41st Street New York, New York 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306 Jayant W. Tambe Aviva Warter Sisitsky

Benjamin Rosenblum

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
	- X	

NOTICE OF PRESENTMENT OF CLAIMS LITIGATION SCHEDULE FOR THE OBJECTION OF DEBTORS AND DEBTORS IN POSSESSION TO CLAIMS OF NOMURA GLOBAL FINANCIAL PRODUCTS, INC.

PLEASE TAKE NOTICE that the undersigned will present the annexed Claims

Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of Nomura

Global Financial Products, Inc. (the "Claims Litigation Schedule") to the Honorable James M.

Peck, United States Bankruptcy Judge, for signature on July 13, 2010 at 12:00 noon (Prevailing Eastern Time).

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PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Claims Litigation Schedule, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by July 13, 2010 at 11:30 a.m. (Prevailing Eastern Time), the Claims Litigation Schedule may be signed.

Dated: July 8, 2010

New York, New York

Respectfully submitted,

/s/ Benjamin Rosenblum

Jayant W. Tambe Aviva Warter Sisitsky Benjamin Rosenblum JONES DAY

222 East 41st Street

New York, New York 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306

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UNITED STA	ATES BAN	KRUPTCY	COURT
SOUTHERN	DISTRIC	T OF NEW	YORK

	·-A	
In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08-13555 (JMP)
Debtors.	:	(Jointly Administered)

CLAIMS LITIGATION SCHEDULE FOR THE OBJECTION OF DEBTORS AND DEBTORS IN POSSESSION TO CLAIMS OF NOMURA GLOBAL FINANCIAL PRODUCTS, INC.

This Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of Nomura Global Financial Products, Inc. [Docket No. 8612] (the "Nomura GFP Claim Objection"), submitted in accordance with the Order Pursuant to Section 105 of the Bankruptcy Code, Bankruptcy Rule 9014, and General Order M-390 Authorizing the Debtors to Implement Claims Hearing Procedures and Alternative Dispute Resolution Procedures for Claims Against Debtors, entered April 19, 2010 [Docket No. 8474] (the "Claims Procedures Order"), is adopted by this Court as the Claims Litigation Schedule for the Nomura GFP Claim Objection.

- 1. Amended pleadings may not be filed except with leave of the Court. Any motion to amend shall be filed within 30 days after entry of this order.
 - 2. All fact discovery shall be completed by January 28, 2011.
- 3. The parties are to conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (as incorporated therein), and the Local Rules of this Court. In accordance with Federal Rules of Bankruptcy Procedure 9014 and 7026, Federal Rules of Civil Procedure 26(a)(2) and 26(a)(3) shall apply to this contested matter.

The following interim deadlines may be extended by the written consent of the parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 2 above:

- A. Requests for production of documents may be served no later than September 27, 2010.
- B. Objections to requests for the production of documents to be filed within 20 days of the service of each request or set of requests for the production of documents.
- C. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(a) and 7033-1(b) may be served no later than September 27, 2010.
- D. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) may be served no earlier than December 1, 2010 and no later than January 28, 2011.
- E. Requests for admissions may be served no earlier than December 1, 2010 and no later than January 28, 2011.
 - F. Document production to be substantially completed by October 29, 2010.
 - G. Depositions of fact witnesses to be completed by January 28, 2011.
- 4. Expert reports will be exchanged on February 28, 2011. The parties will exchange any rebuttal expert reports on March 29, 2011. Expert discovery to be completed 21 days after the receipt of the last expert report.
 - 5. Dispositive motions to be filed no later than April 29, 2011.
 - 6. A pre-merits hearing conference shall be held at a date to be determined.
- 7. The merits hearing shall be held at a date to be determined in accordance with the Claims Procedures Order.

Dated: July 7, 2010

New York, New York

Corinne Ball Jayant W. Tambe Aviva Warter Sisitsky JONES DAY

222 East 41st Street

New York, New York 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306

Attorneys for the Debtors and Debtors in Possession

Dated: July 7, 2010

New York, New York

Douglas P. Bartner

Henry Weisburg Brian H. Polovov

SHEARMAN & STERLING LLP

599 Lexington Avenue

New York, New York 10022 Telephone: (212) 848-4000 Facsimile: (212) 848-7179

Attorneys for

Nomura Global Financial Products, Inc.

Dated: July ____, 2010 New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE